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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

JENNIFER XUJIA WANG, and  
RUBEN a/k/a RUOPIAN CHEN,

Defendants,

and

ZHILING FENG,

Relief Defendant.

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Civil Action No.  
07-CV-3715 (AKH)  
ECF CASE

**DECLARATION OF KINGDON KASE**

I, Kingdon Kase, declare as follows:

1. I am counsel for Plaintiff Securities and Exchange Commission

("Commission") in this action. I make this Declaration pursuant to Rules 6 and 65(b) of the Federal Rules of Civil Procedure.

2. No advance notice of the filing of this action or the Commission's request for emergency relief has been provided to the Defendants based on the egregiousness of their conduct and the Commission's concern that assets will be dissipated and the risk that Defendants Chen and Wang might flee the jurisdiction and, indeed, the country, as set forth in greater detail in the Commission's Complaint, its *Ex Parte* Application for a Temporary Restraining Order, Preliminary Injunction, and Order Freezing Assets and Granting Other Relief, the memorandum filed in support thereof, and the Declaration of Daniel L. Koster.

I declare under penalty of perjury under the laws of the United States of America, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge, information and belief.

A large, stylized handwritten signature in black ink, appearing to be 'Amy J. Greer', is written over a horizontal line.

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Dated: May 10, 2007